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Google Inc. and Google Payment Corporation

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ALICE SVENSON, individually and on  
behalf of all others similarly situated,  
  
Plaintiff,  
  
v.  
  
GOOGLE INC., a Delaware Corporation,  
and GOOGLE PAYMENT  
CORPORATION, a Delaware Corporation,  
  
Defendants.

Case No. CV-13-04080-BLF

**DECLARATION OF BREENA M. ROOS  
IN SUPPORT OF DEFENDANTS GOOGLE  
INC. AND GOOGLE PAYMENT  
CORPORATION'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
CONFIDENTIAL INFORMATION (CIV. L.  
R. 79-5(d)(1)(A))**

Breena M. Roos declares:

1. I am an attorney with the law firm of Perkins Coie LLP and counsel for defendants Google Inc. and Google Payment Corporation ("Defendants") in the above-captioned matter. I submit this declaration pursuant to Civil Local Rule 79-5(d)(1)(A) in support of the sealing of certain confidential, sensitive, and proprietary information filed in connection with Defendants' Reply in Support of Motion for Summary Judgment as to Plaintiff's Individuals Claims and

1 Reply in Support of Motion to Exclude the Testimony of Henry Fishkind. I have personal  
2 knowledge of the facts set forth in this declaration and am competent to testify to its contents.

3 2. Pursuant to Local Rule 79-5(d)(1)(A), Defendants submit this Declaration in  
4 support of the sealing of **Exhibits D-F** to the Supplemental Declaration of Charles C. Sipos in  
5 Support of Defendants Google Inc. and Google Payment Corporation's (1) Reply in Support of  
6 Motion for Summary Judgement as to Plaintiff's Individual Claims and (2) Reply in Support of  
7 Motion to Exclude the Testimony of Henry Fishkind.

8 3. **Exhibits D and E** are excerpts of deposition testimony of Defendants' employee  
9 Mark Thomas involving discussions of Defendants' business matters, including Google Wallet.  
10 This testimony contains and reflects confidential, sensitive, and proprietary information regarding  
11 Google Wallet, which Defendants designated as "Confidential" and "Highly Confidential" under  
12 the terms of the Parties' Stipulated Protective Order (Dkt. No. 82) ("Protective Order").

13 4. **Exhibit F** represents an internal document that contains confidential, sensitive,  
14 and proprietary information regarding Defendants' business matters, including Google Wallet,  
15 which Defendants designated as "Confidential" under the terms of the Protective Order.

16 5. Public disclosure of Defendants' confidential and proprietary information reflected  
17 in Exhibits D-F would provide insight into Defendants' confidential business matters and cause  
18 Defendants to suffer competitive harm.

19  
20 I declare under penalty of perjury under the laws of the United States that the foregoing is  
21 true and correct.

22 Executed this 10th day of August, 2016, at Seattle, Washington.

23  
24 /s/ Breena M. Roos  
Breena M. Roos